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TMS/NAM: USAO 2013R00562

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

STEPHEN TODD ALLEN,
a/k/a "Todd,"
RONALD EMERY WARREN,
a/k/a "Ron,"
JOHN FRANCIS LACEY III,
a/k/a "Jay,"
JENNIFER MARIE RICHMAN,
a/k/a "Big Red,"
JAMES BARFIELD,
GREGORY HAMILTON,
MICHAEL HOWARD,
STEPHEN MYERS, and
JONATHAN LEON NEILL,

Defendants

CRIMINAL NO.

JFM 14 CR 0188

(Conspiracy to Distribute and Possess
With Intent to Distribute
Methamphetamine, 21 U.S.C. § 846;
Forfeiture, 21 U.S.C. § 853)

FILED ENTERED
LODGED RECEIVED

APR 21 2014

AT GREENBELT
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

by

DEPUTY

INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that:

Between in and about July 2013 and in or about April 2014, in the District of Maryland
and elsewhere, the defendants,

STEPHEN TODD ALLEN,
a/k/a "Todd,"
RONALD EMERY WARREN,
a/k/a "Ron,"
JOHN FRANCIS LACEY III,
a/k/a "Jay,"
JENNIFER MARIE RICHMAN,
a/k/a "Big Red,"
JAMES BARFIELD,

**GREGORY HAMILTON,
MICHAEL HOWARD,
STEPHEN MYERS, and
JONATHAN LEON NEILL,**

did knowingly combine, conspire, confederate and agree with others known and unknown to the Grand Jury to distribute and possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841.

21 U.S.C. § 846

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further charges that:

1. As a result of the offense set forth in Count One of this Indictment, the defendants,

**STEPHEN TODD ALLEN,
a/k/a "Todd,"
RONALD EMERY WARREN,
a/k/a "Ron,"
JOHN FRANCIS LACEY III,
a/k/a "Jay,"
JENNIFER MARIE RICHMAN,
a/k/a "Big Red,"
JAMES BARFIELD,
GREGORY HAMILTON,
MICHAEL HOWARD,
STEPHEN MYERS, and
JONATHAN LEON NEILL,**

shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the charged offense. The property to be forfeited includes, but is not limited to, \$1,377,600 in United States currency.

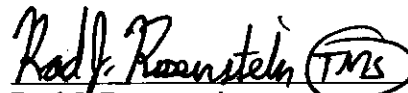
2. If, as a result of any act or omission of the defendants, any such property subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be

subdivided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

21 U.S.C. § 853


Rod J. Rosenstein
United States Attorney

A TRUE BILL

(**SIGNATURE REDACTED**)

Foreperson 